

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

## HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

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Colorado Department  
of Public Health  
and Environment

May 17, 2000

Joseph A. Legare  
US Department of Energy, RFFO  
10808 Highway 93, Unit A  
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### **RSOP for Facility Disposition Revision 0, April 17, 2000**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment (CDPHE) has reviewed this above-referenced document and finds it suitable for release for the 45-day public comment period. CDPHE staff have provided specific comments on this document, attached to this letter.

One complication is that this document relies on a decommissioning process (reconnaissance level characterization, component removal, pre-demolition survey, facility disposition and environmental restoration) that uses RSOPs. Unfortunately, at this time not all of these documents have been developed and/or submitted, and the ER RSOP is not scheduled until next year. As a result, it is difficult to determine whether all of the pieces of the puzzle are present. It is our expectation that until all these documents are completed, an activity- or building-specific decision document will be required that encompasses those missing portions of decommissioning or ER.

Please contact me at 692-3367 or Steve Tarlton at 692-3423 if you have any questions.

Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

Encl.

**ADMIN RECORD**

SW-A-004044

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**CDPHE Comments on  
RSOP for Facility Disposition  
Revision 0, April 17, 2000**

<u>Section</u>	<u>Comment</u>
1	<p>Second paragraph: This section is confusing. How could this RSOP be used for Type 3 facilities prior to submittal of a DOP? Recommend removing the last sentence.</p> <p>Fourth paragraph: Removal of excess equipment and asbestos, completion of decontamination, etc. is a requirement not an assumption.</p>
Figure 1	<p>DOPs and IM/IRAs are not shown; add a parallel line around the component removal RSOP showing the use of a DOP, IM/IRA, or PAM.</p>
2	<p>It is somewhat vague as to what the notification letter will include. The notification letter must define what requirements and controls from the RSOP will be utilized. Recommend reorganizing this paragraph to show explicit notification letter contents.</p> <p>The phrase "no other requirements or controls apply to type 1 facilities" might imply that standard site procedures will not be used. Rewording might make your point more effectively.</p>
4	<p>The requirements for leaving a slab in place with an interim cover clearly cannot be included in this RSOP, but must be described somewhere. Suggest a general statement such as in Bullet 8 on page 10.</p> <p>Page 7 lists steps in the process, and implies that the notification letter for use of this RSOP would be submitted prior to decontamination. We expect that acceptance of the notification letter would occur after receipt of the Pre-Demolition Survey Report. Suggest adding the notification letter submittal after current item 8.</p>
Figure 2	<p>The box stating "leave slab in place" should be more explicit, such as "leave portions of the structure more than 3' below grade in place."</p>
4	<p>Terms such as "facility footprint" and "facility perimeter" are discussed. These terms need further clarification. In addition, where will this information be included, will these maps be included as part of this RSOP or other RSOPs?</p> <p>Need to identify the removal of other groundcover besides the slab that may be associated with a facility, such as driveways, sidewalks, etc.</p>

Need to address the actions that will be taken in regards to underground tunnels and/or buildings.

The possible future effects on groundwater need to be included when proposing leaving a structure, slab or foundation walls that are deeper than 3 feet below grade in place. Data for this assessment should be provided by the groundwater balance study and models currently being conducted. Additional actions may be necessary depending on the environmental consequences of leaving the structure in place.

The D&D and ER activities regarding building structures below the 3 foot depth needs to be clarified. The 9<sup>th</sup> bullet on page 10 indicates that D&D will remove structures and foundations below 3 feet to access soil that requires remediation. Yet the 11<sup>th</sup> bullet indicates that ER will remove the slabs below 3 feet to remediate UBC. Since this appears to be a bit confusing, the rationale for who will be responsible for removing building structure below 3 feet needs to be included.

Groundwater, or other water collected in sumps, vaults, etc needs to be identified and properly characterized prior to initiating D&D activities. Water collected during D&D activities also needs to be properly characterized to determine proper disposal.

Soil and sediment displaced by water during D&D activities needs to be sampled and analyzed for potential contaminants of concern, due to the possible concentration of contaminants in the sediments deposited by flowing water. Contamination may come from D&D activities and/or from contaminated soil disturbed by D&D activities.

Page 10, Bullet 10; add at the end of the last sentence, "or site specific decision document."

- 4.1 Page 11, the LRA must approve PDS survey plans, pursuant to CERCLA provisions for SAPS.

Page 12, first sentence, indicates that the PDS survey must be completed prior to planning demolition. The majority of demolition planning should be underway by this point in time.

- Figure 3 Include the development of JHAs, Health and Safety Plans, etc.

- 4.2.2.6 It may be realistic to propose the use of explosives at RFETS; however, this will never be routine nor repetitive. Any explosive usage will require specific plans and details for LRA approval.

- 4.3.3 Surface water will not be contained or sampled during demolition activities; however, the D&D activity may generate contaminated surface water runoff, as noted in the comments above. How will this potential problem be managed if the surface water is not collected or sampled? In addition, will basic storm water requirements be implemented? Is the "surface water" discussed in this section the same or possibly the same as the liquids from the demolition method that may be generated and contained as shown on Figure 4? Section 4.3.3 should be expanded or there should be a specific reference or tie to Section 5.3 and Attachment 2 if that is the basic intent of this section and the IWCP reference.
- 4.5 All waste, including that covered by the requirements of the Consent Orders, will be removed prior to facility demolition.
- 7 Prior to initiation of the RSOP RFETS must prove that the facility is free of contamination by submission of a pre-demolition survey report and regulatory approval from both LRA and SRA.. Add this to the list of list of necessary actions in the first paragraph.
- 7.1 Modify second sentence to read, "No further formal approvals of the RSOP are required."

Delete Bullet 7

- Attachment 2 Stormwater/Dust Suppression Water Control: Stormwater controls should be described. In general, the controls should be equivalent to what would be required under an NPDES Stormwater permit.

In order to insure that potentially contaminated sediments are contained to the maximum extent practicable, a reasonable Best Management Practice would be to provide for sedimentation as close as possible to the area of disturbance. And, an additional BMP would be for the sediments to be screened for contamination as soon the D&D activity is completed.